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July 1, 2024

The Honorable Michael A. Hammer, U.S.D.C.M.J.
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: ***United States v. Scanlon*, 23 Mag. 10168 (MAH)**

Dear Judge Hammer,

This firm recently substituted as lead counsel in the pending matter. Please accept this letter in lieu of a formal motion on behalf of Defendant Christopher Scanlon. We respectfully move to modify bail conditions to allow Mr. Scanlon to travel to Miami, Florida from his current residence in Kissimmee, Florida, to facilitate meetings with counsel including review of open issues in the matter. Mr. Scanlon is currently subject to home confinement with electronic monitoring, in which he is restricted to the Middle District of Florida and District of New Jersey.

Under the proposed modification, Mr. Scanlon would drive to and remain in Miami, overnight from July 7, 2024 to July 11, 2024, which is approximately 200 miles from his residence in Kissimmee, Florida but within the Southern District of Florida. He intends to stay at a hotel in the Brickell area in Miami throughout this period but prior to commencement of travel he will provide the specifics of the hotel to his Pre-Trial officer. A proposed consent order is attached.

Government counsel does not object to this request. Because of the overnight nature of the travel, Pretrial Services requested Court authorization for the proposed trip.

We are available to answer any questions.

Respectfully submitted,

/s/ *Michael S. Weinstein*

Michael S. Weinstein

cc: All counsel of record (via ECF)
U.S. Pretrial Services Officer Andrew Dziopa (via email)
U.S. Pretrial Services Officer Ivette Suárez (via email)